

REMARKS

Claims 1-16 were originally filed in the present application.

Claims 1-16 are pending in the present application.

Claims 1-16 were rejected in the April 18, 2006 Office Action.

No claims have been allowed.

Claims 1, 8 and 15 are amended herein.

Claims 3, 4, 10, 11 and 16 have been cancelled.

New claims 17-22 have been added.

Claims 1, 2, 5-9, 12-15 and 17-22 remain in the present application.

Reconsideration of the claims is respectfully requested.

In Sections 4 and 5 of the April 18, 2006 Office Action, the Examiner rejected Claims 1-16 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,509,913 to Martin, et al. ("*Martin*") in view of US Patent No. 6,324,693 to Broderson, et al. ("*Broderson*"). The Applicants respectfully traverse the rejection.

The Applicants direct the Examiner's attention to amended independent Claim 1, which contains the unique and non-obvious limitations emphasized below:

1. A wireless communication device comprising:
 - a main controller capable of executing a basic operating system application program that operates communication functions of said wireless communication device and that controls a first graphical user interface (GUI) for interacting with a user;
 - a memory, within the wireless communication device, coupled to said main controller, capable of storing a first GUI configuration file and a second GUI configuration file; wherein said first GUI configuration file contains first GUI parameter data comprising
 - a first plurality of text names,

a corresponding plurality of data comprising at least one of: sounds, graphical images, text, menu options and a menu hierarchy associated with said first graphical user interface, and

a first text name checksum value calculated from only said first plurality of text names, and

said second GUI configuration file contains second GUI parameter data comprising a second plurality of text names,

a corresponding plurality of data comprising at least one of: sounds, graphical images, text, menu options and a menu hierarchy associated with a second graphical user interface, and

a first text name checksum value calculated from only said first plurality of text names; and

wherein said main controller is operable to validate said second GUI parameter data by comparing said first text name checksum value contained in said first GUI configuration file with said second text name checksum value contained in said second GUI configuration file. (*Emphasis added*).

The Applicants respectfully submit that the above-emphasized limitations are not disclosed, suggested, or even hinted at in the *Martin* reference, the *Brodersen* reference, or the combination of the *Martin* reference and the *Brodersen* reference.

The Examiner asserts that the *Martin* reference teaches first and second GUI files containing text names, citing column 6, lines 18-27. The Applicants respectfully submit that the Examiner mischaracterizes the teaching of the *Martin* reference.

The *Martin* reference uses reference characters **C1-C8** to refer to man-machine interface (MMI) components in Figure 2B and Table 1. Several facts about the drafting of the reference indicate that the appellations **C1-C8** are reference characters, rather than data in the screen configuration information. First, the draftsman of the *Martin* reference consistently used bold type to set reference characters apart from the remainder of the text of the specification. For example, in the paragraph at column 6, lines 5-27, bold text is used for the reference characters **218**, **250** and **C1-C8**.

Second, the draftsman always followed a reference to an element with the element's reference character. For example, in lines 55-67 of column 6 may be found several examples: "the screen 250", "the network gateway 208", "the first component C1", and "the third component C3". This pattern of usage continues throughout the text describing Figure 2B. Thus, it is clear from the text of the *Martin* reference that the identifiers C1-C8 are reference characters, and not text names in the screen configuration information, as asserted by the Examiner.

The *Martin* reference contains no teaching of how MMI components are identified in the screen configuration information. Many other aspects of the screen configuration information are described, but there is no teaching that it includes a first plurality of text names and a corresponding plurality of data elements, as recited in Claim 1.

The Examiner further asserts that the *Brodersen* reference teaches validating a second file by comparing a checksum in the second file with a checksum in a first file., citing column 17, lines 51-60. The cited passage describes "a checksum value for [an] upgrade file set." Thus, the teaching of the *Brodersen* reference is of a conventional checksum over an entire file, or in this case a file set. Were the teaching of the *Brodersen* reference to be applied to the screen configuration information of the *Martin* reference, the result would be a checksum over the entirety of the screen configuration information.

In contrast, Claim 1 recites a checksum over only a portion of a GUI configuration file. A GUI configuration file of Claim 1 includes both a plurality of text names and a corresponding

plurality of data elements. However, a text name checksum value of Claim 1 is calculated using only the plurality of text names, not the corresponding plurality of data elements.

As such, independent Claim 1 contains patentable subject matter over the *Martin* reference and the *Brodersen* reference. Also, dependent Claims 2, 5-7, 17 and 18 depend from Claim 1 and contain all of the unique and non-obvious limitations recited in Claim 1. Thus, Claims 2, 5-7, 17 and 18 also are patentable over the cited prior art references.

Amended independent Claims 8 and 15 contains limitations that are analogous to the unique and non-obvious limitations recited in independent Claim 1. This being the case, Claims 8 and 15 are patentable over the *Martin* reference and the *Brodersen* reference. Furthermore, dependent Claims 9, 12-14, 19 and 20, which depend from Claim 8, and dependent Claims 21 and 22, which depend from Claim 15, contain all of the unique and non-obvious limitations recited in their respective base claims. Thus, dependent Claims 9, 12-14, 19 and 20-22 also are patentable over the cited prior art references.

SUMMARY

For the reasons given above, the Applicants respectfully request reconsideration and allowance of the pending claims and that this application be passed to issue. If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this application, the Applicants respectfully invite the Examiner to contact the undersigned at the telephone number indicated below or at *jmockler@munckbutrus.com*.

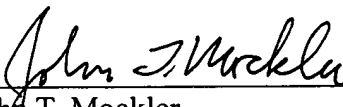
The Commissioner is hereby authorized to charge any additional fees connected with this communication or credit any overpayment to Deposit Account No. 50-0208.

Respectfully submitted,

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